

**EXHIBIT 3**  
REDACTED VERSION  
OF DOCUMENT  
PROPOSED TO BE  
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Monteleone, Santhiran Naidoo, Enrique  
Romualdez, and Lucas Vasconcelos*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

ELECTRIC SOLIDUS, INC. d/b/a  
SWAN BITCOIN, a Delaware  
corporation,

Plaintiff,

v.

PROTON MANAGEMENT LTD., a  
British Virgin Islands corporation;  
THOMAS PATRICK FURLONG; ILIOS  
CORP., a California corporation;  
MICHAEL ALEXANDER HOLMES;  
RAFAEL DIAS MONTELEONE;  
SANTHIRAN NAIDOO; ENRIQUE  
ROMUALDEZ; and LUCAS  
VASCONCELOS,

Defendants.

Case No. 2:24-cv-8280-MWC-E

**INDIVIDUAL DEFENDANTS  
THOMAS PATRICK FURLONG,  
ILIOS CORP., MICHAEL  
ALEXANDER HOLMES, RAFAEL  
DIAS MONTELEONE,  
SANTHIRAN NAIDOO, ENRIQUE  
ROMUALDEZ, AND LUCAS  
VASCONCELOS'S OBJECTIONS  
AND RESPONSES TO  
PLAINTIFF'S SECOND SET OF  
REQUESTS FOR PRODUCTION**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the United States District Court for the Central District of California's Local Rules, Defendants Thomas Patrick Furlong, Michael Alexander Holmes, Ilios Corp. ("Ilios"), Rafael Dias Monteleone, Santhiran Naidoo, Enrique Romualdez and Lucas Vasconcelos (the "Individual Defendants") hereby provide objections and responses ("Responses") to Plaintiff Electric Solidus, Inc., d/b/a Swan Bitcoin's ("Swan" or "Plaintiff") Second Set of Requests for Production ("Requests"), dated March 17, 2025.

### **PRELIMINARY STATEMENT**

Individual Defendants have prepared these Responses based on their good faith understanding of each Request, and based upon their reasonable investigation to date. Individual Defendants reserve their right to correct any errors or omissions and to revise their Response as a result of discussions or agreements with Plaintiff about the scope of the Requests. By responding to the Requests, Individual Defendants do not admit that any of the allegations in the Action are accurate or sufficient to state any claims. No other incidental or implied admissions are intended by these Responses.

Individual Defendants do not waive or intend to waive any objections that they may have regarding the use of any information provided and/or documents produced, and Individual Defendants expressly reserve the right to: (a) object to Plaintiff's use of any documents and/or information provided on the ground of inadmissibility; and (b) object on any and all proper grounds, at any time, to any other discovery involving or relating to any documents and/or information produced. No incidental or implied admissions are intended by the Responses set forth herein.

These Responses are made solely for the purpose of this action. Nothing herein shall be construed as an admission respecting the admissibility or the relevance of any facts, documents, or information, as an admission that documents or

1 information exist, or as an admission as to the truth or accuracy of any  
2 characterization or assertion contained in any Request. Each Response is subject to  
3 all objections as to competence, relevance, materiality, privilege, propriety, and  
4 admissibility, and any and all other objections on grounds that would require the  
5 exclusion of any statement herein if any of the Requests were asked of, or statements  
6 contained herein were made by, a witness present and testifying in court, all of which  
7 objections and grounds are reserved and may be interposed at the time of trial.

### 8 **GENERAL OBJECTIONS**

9 The following General Objections are hereby incorporated by reference into  
10 each and every specific Response set forth below. From time to time, a specific  
11 Response may repeat a General Objection for emphasis or on some other basis. The  
12 omission of any General Objection in any specific Response is not intended to be and  
13 should not be construed as a waiver or limitation of any General Objection to that  
14 Response. The inclusion of any specific objections in the Responses below is not  
15 intended as, nor shall it in any way be deemed, a waiver of any General Objection or  
16 of any specific objection made herein or that may be asserted at another date. Each  
17 General Objection to the Requests applies to each and every Request.

18 These Responses and any documents produced by Individual Defendants are  
19 based upon information and writings available to and located by Individual  
20 Defendants and its attorneys as of the time of service of these Responses. Individual  
21 Defendants reserves the right to rely on any facts, documents, or other evidence that  
22 may develop or subsequently come to its attention.

23 1. Individual Defendants object to the Requests, as well as each of  
24 Plaintiff's Instructions and Definitions, as vague, overly broad, unduly burdensome,  
25 oppressive, duplicative of other discovery, and beyond the proper scope of discovery.

26 2. Individual Defendants object to the Requests, as well as each of  
27 Plaintiff's Instructions and Definitions, to the extent they seek to impose obligations  
28 on Individual Defendants that are inconsistent with and/or beyond the scope of those

1 imposed or authorized by the Federal Rules of Civil Procedure, the Central District  
2 of California's Local Rules, and/or any other applicable statutes, rules, regulations or  
3 orders.

4 3. Individual Defendants object to the Requests, as well as each of  
5 Plaintiff's Instructions and Definitions, to the extent they seek documents and/or  
6 information protected by the attorney-client privilege, work product doctrine, the  
7 common interest privilege, right to privacy, or other applicable privilege, protection,  
8 or doctrine. Individual Defendants will not construe the Requests as seeking any such  
9 documents and/or information, and none will be provided. Any disclosure of such  
10 documents and/or information is inadvertent, is not intended to, and does not  
11 constitute a waiver of the privilege or protection.

12 4. Individual Defendants object to the Requests, as well as each of  
13 Plaintiff's Instructions and Definitions, to the extent they seek documents and/or  
14 information that are readily available to Plaintiff through public sources and records,  
15 do not exist, or are not reasonably available to or within Individual Defendants'  
16 knowledge, possession, custody, or control.

17 5. Individual Defendants object to the Requests, as well as each of  
18 Plaintiff's Instructions and Definitions, to the extent that they seek information  
19 and/or documents about subjects that are irrelevant to the subject matter of this action  
20 and/or not reasonably calculated to lead to the discovery of admissible evidence.

21 6. Individual Defendants object to the Requests, as well as each of  
22 Plaintiff's Instructions and Definitions, to the extent that the burden, expense, or  
23 intrusiveness of each Request clearly outweighs the likelihood that the documents  
24 and/or information sought will lead to the discovery of admissible evidence.

25 7. Individual Defendants object to the Requests, as well as each of  
26 Plaintiff's Instructions and Definitions, to the extent that they call for an improper  
27 legal conclusion. The Responses by Individual Defendants shall not be construed as  
28 providing a legal conclusion concerning the meaning or application of any terms or

1 phrases used in Plaintiff's Requests.

2 8. Individual Defendants object to the Requests, as well as each of  
3 Plaintiff's Instructions and Definitions, to the extent that they purport to characterize  
4 the pleadings, claims, defenses, or factual matters in or involving this case.

5 9. Individual Defendants object to the Requests, as well as each of  
6 Plaintiff's Instructions and Definitions, to the extent that they seek disclosure of  
7 confidential, personal, and/or private information, or information that is protected  
8 from disclosure by law, including, but not limited to, privacy laws, court orders, or  
9 any agreements with respect to confidentiality or nondisclosures.

10 10. Individual Defendants object to the Requests, as well as each of  
11 Plaintiff's Instructions and Definitions, to the extent they seek the creation of  
12 documents or data compilations that do not exist or are not ordinarily kept in the  
13 normal course of business.

14 11. Individual Defendants object to the Requests, as well as each of  
15 Plaintiff's Instructions and Definitions, to the extent they seek "any" or "all"  
16 documents and/or information on the grounds that such Requests are unduly  
17 burdensome and not consistent with Individual Defendants' duties and  
18 responsibilities under the Federal Rules of Civil Procedure and the United States  
19 District Court for the Central District of California's Local Rules. Subject to all of  
20 the objections herein, if discovery in this Action proceeds, Individual Defendants will  
21 conduct a reasonable and diligent search in good faith to discover and identify the  
22 relevant documents and/or information properly sought by the Requests.

23 12. Individual Defendants' Responses are made without in any way waiving  
24 or intending to waive, but rather are made preserving and intending to preserve:

- 25 a. The right to object on any ground whatsoever to the production into  
26 evidence or other use of the Responses contained herein at any trial,  
27 arbitration, mediation, or any other proceeding in this matter or in  
28 any other action;

- 1           b. The right to object on any ground whatsoever at any time to any  
2           demand for further responses to the Requests; and  
3           c. The right to provide supplemental responses to the Requests or  
4           otherwise to supplement, revise, or explain the information  
5           contained in the Responses and the testimony given in response to  
6           the Requests in light of information gathered through further  
7           investigation and discovery.

8           13. Individual Defendants object to these Requests to the extent that they  
9           seek information that is protected from disclosure by international law, including but  
10          not limited to the European Union’s General Data Protection Regulation (“GDPR”).

11          14. Individual Defendants object to these Requests on the grounds that the  
12          Requests bear no relation to temporary injunctive relief in aid of arbitration, the only  
13          potential form of discovery that may be allowed under the Consulting Agreements in  
14          this Court, and that further no arbitration is pending as to them. *See* ECF No. 164 at  
15          13. Individual Defendants reserve all rights relating to, and by responding to these  
16          Requests are not waiving, their contention that this litigation does not seek temporary  
17          injunctive relief in aid of arbitration, and all disputes between the parties should be  
18          resolved in arbitration. These Requests are accordingly overly broad, unduly  
19          burdensome, oppressive, and beyond the proper scope of discovery.

20          15. Individual Defendants object to these Requests on the grounds that  
21          Swan has failed to serve proper Section 2019.210 disclosures regarding the trade  
22          secrets that are purportedly the subject of its claims. Under the Court’s standing  
23          order and applicable law, discovery is thus premature and should not proceed.  
24          Nevertheless, without waving said objections and reserving all rights relating to  
25          same, the Individual Defendants are providing substantive responses to these  
26          Requests and not withholding any documents on the basis that Swan’s Section  
27          2019.20 disclosures are inadequate.  
28



**OBJECTIONS TO INSTRUCTIONS**

16. Individual Defendants object to Instruction Nos. 1, 2, 3, 4, 5, 6, 7, 8, 9, 17, 18 19, 20 and 21, to the extent to which they seek to impose burdens greater than those required by the Federal Rules of Civil Procedure, the Federal Rules of Evidence, and the United States District Court for the Central District of California's Local Rules.

17. Individual Defendants object to Instruction No. 1, which provides for a responsive timeframe of August 2, 2024 to the present (the "Relevant Period"), as such a time frame is overbroad and unduly burdensome, as well as Swan's request to provide responses and documents outside that time frame.

18. Individual Defendants object to Instruction No. 13 to the extent that it introduces ambiguity into the Requests. Uncapitalized terms will be given their ordinary meaning.

19. Individual Defendants object to Instruction No. 16 to the extent that it states "entities or corporations other than natural persons shall be deemed to include, in addition to the entity named, its divisions, departments, subsidiaries, affiliates, parents, predecessors, present or former officers, present or former directors, employees, agents, representatives, accountants and attorneys, successors, and all other Persons acting or purporting to act on behalf of each such entity or corporation," as such an instruction is overbroad, unduly burdensome, vague and ambiguous. For the purposes of responding to the Requests, Individual Defendants will construe the entity named to refer to the entity named and its known employees and directors.

20. Individual Defendants object to Instruction No. 18 to the extent that it seeks to characterize documents. Any documents referred to by Plaintiffs speak for themselves.

21. Individual Defendants object to Instruction Nos. 19, 20, and 21, because the details of the format of any production of documents shall be the subject of a negotiated ESI protocol rather than Plaintiff's unilateral instructions.



**OBJECTIONS TO DEFINITIONS**

22. Individual Defendants object to the definition of “Communication” as overly broad, unduly burdensome, vague, ambiguous and unintelligible to the extent it includes “whether or not the Communication was ever disclosed, sent, or transmitted.” For purposes of responding to the Requests, Individual Defendants will exclude the portion noted above from the definition of “Communications” in the Requests, and interpret the otherwise overbroad definition not to impose a burden beyond what is required by the Federal Rules of Civil Procedure, the Federal Rules of Evidence, and the Local Civil Rules of the U.S. District Court for the Central District of California.

23. Individual Defendants object to the definition of “Defendant” and “Defendants” as overly broad, unduly burdensome, vague, ambiguous and unintelligible to the extent that it includes the Individual Defendants’ “members, employees, representatives, officers, directors, managers, agents, attorneys, assigns, predecessors, affiliates, parents, subsidiaries, and any other entities or Persons acting or purporting to act on their behalf.” For purposes of responding to the Requests, Individual Defendants will interpret “Defendant” and “Defendants” as referring to the named Defendants.

24. Individual Defendants object to the definition of “Proton” as overly broad, unduly burdensome, vague, ambiguous and unintelligible to the extent that it includes “any of its members, employees, representatives, officers, directors, managers, agents, attorneys, assigns, predecessors, affiliates, parents, subsidiaries, and any other entities or Persons acting or purporting to act on its behalf.” For purposes of responding to the Requests, Individual Defendants will interpret “Proton” as referring to Defendant Proton Management Ltd.

25. Individual Defendants object to the definition of “Individual Defendants” as overly broad, unduly burdensome, vague, ambiguous and unintelligible to the extent that it includes “any of their members, employees,

1 representatives, officers, directors, managers, agents, attorneys, assigns,  
2 predecessors, affiliates, parents, subsidiaries, and any other entities or Persons acting  
3 or purporting to act on their behalf.” For purposes of responding to the Requests,  
4 Individual Defendants will interpret “Individual Defendants” as referring to the  
5 Individual Defendants described in the introduction to this Response.

6 26. Individual Defendants object to the definition of “Elektron Energy” as  
7 overly broad, unduly burdensome, vague, ambiguous and unintelligible to the extent  
8 that it includes “any of its members, employees, representatives, officers, directors,  
9 managers, agents, attorneys, assigns, predecessors, affiliates, parents, subsidiaries,  
10 and any other entities or Persons acting or purporting to act on its behalf.” For  
11 purposes of responding to the Requests, Individual Defendants will interpret  
12 “Elektron Energy” as referring to Elektron Management LLC.

13 27. Individual Defendants object to the definition of “Expenditure” as  
14 overly broad, unduly burdensome, vague, ambiguous and unintelligible to the extent  
15 that it includes “anything of value,” or “a written contract, promise, or agreement to  
16 make an expenditure.” For purposes of responding to the Requests, Individual  
17 Defendants will interpret “Expenditure” as “any purchase, payment, distribution,  
18 loan, advance, deposit, [or] gift of money.”

19 28. Individual Defendants object to the definition of “Complaint” or  
20 “Operative Complaint” as overly broad, unduly burdensome, vague, ambiguous and  
21 unintelligible to the extent that it is defined as “the most recent complaint filed in this  
22 Action.” For purposes of responding to the Requests, Individual Defendants will  
23 interpret “Complaint” or “Operative Complaint” as ECF. No. 101.

24 29. Individual Defendants object to the definition of “Ilios” as overly broad,  
25 unduly burdensome, vague, ambiguous and unintelligible to the extent that it includes  
26 “any of its members, employees, representatives, officers, directors, managers,  
27 agents, attorneys, assigns, predecessors, affiliates, parents, subsidiaries, and any  
28 other entities or Persons acting or purporting to act on its behalf.” For purposes of

1 responding to the Requests, Individual Defendants will interpret “Ilios” as referring  
2 to Defendant Ilios Corp.

3 30. Individual Defendants object to the definition of “You” as overly broad,  
4 unduly burdensome, vague, ambiguous and unintelligible to the extent that it includes  
5 “any of its [or their] members, employees, representatives, officers, directors,  
6 managers, agents, attorneys, assigns, predecessors, affiliates, parents, subsidiaries,  
7 and any other entities or Persons acting or purporting to act on its [or their] behalf.”  
8 For purposes of responding to the Requests, Individual Defendants will interpret  
9 “You” as referring to each of the Individual Defendants, and each Individual  
10 Defendant will be responding on behalf of himself or itself only.

11 31. Individual Defendants object to the definition of “Site” as overly broad,  
12 unduly burdensome, vague, ambiguous and unintelligible to the extent that it is  
13 defined as “physical or virtual infrastructure where computational resources are used  
14 to perform Bitcoin mining operations.” For purposes of responding to the Requests,  
15 Individual Defendants will interpret “Site” as referring to a physical place where the  
16 mining of bitcoin occurs via the use of specialized mining hardware such as  
17 application-specific integrated circuits (“ASICs”).

18 32. Individual Defendants object to the definition of terms “relating to,”  
19 “related to,” and “in connection with” as overly broad, unduly burdensome, vague,  
20 ambiguous and unintelligible to the extent that it is defined as to “bring within the  
21 scope of the requests any information and Document that . . . implicitly comprises,  
22 evidences, embodies, constitutes, describes, responds to, reflects, was reviewed in  
23 conjunction with, or was generated as a result of, the subject matter of the request.”  
24 For purposes of responding to the Requests, Individual Defendants will interpret  
25 “relating to,” “related to,” and “in connection with” as referring to “any extent,  
26 relating to, referring to, reflecting, and their variants and shall be construed to bring  
27 within the scope of the requests any information and Document that explicitly  
28 comprises, evidences, embodies, constitutes, describes, responds to, reflects, was

1 reviewed in conjunction with, or was generated as a result of, the subject matter of  
2 the request.”

3 33. Individual Defendants object to the definition of “[REDACTED]y” as  
4 overly broad, unduly burdensome, vague, ambiguous and unintelligible to the extent  
5 that it includes “any of the members, employees, representatives, officers, directors,  
6 managers, agents, attorneys, assigns, predecessors, affiliates, parents, subsidiaries,  
7 and any other entities or Persons acting or purporting to act on its behalf, including  
8 but not limited to [REDACTED]” For purposes of responding to the  
9 Requests, Individual Defendants will interpret “[REDACTED]” as referring to  
10 [REDACTED]

11 34. Individual Defendants object to the definition of “[REDACTED]” as overly  
12 broad, unduly burdensome, vague, ambiguous and unintelligible to the extent that it  
13 includes “any of its members, employees, representatives, officers, directors,  
14 managers, agents, attorneys, assigns, predecessors, affiliates, parents, subsidiaries,  
15 and any other entities or Persons acting or purporting to act on its behalf” and does  
16 not include the name of a legal entity. For purposes of responding to the Requests,  
17 Individual Defendants will interpret “[REDACTED]” as referring to [REDACTED]  
18 [REDACTED]

19 35. Individual Defendants object to the definition of “[REDACTED]” as  
20 overly broad, unduly burdensome, vague, ambiguous and unintelligible to the extent  
21 that it includes “any of its members, employees, representatives, officers, directors,  
22 managers, agents, attorneys, assigns, predecessors, affiliates, parents, subsidiaries,  
23 and any other entities or Persons acting or purporting to act on its behalf, including  
24 but not limited to [REDACTED]” For purposes of responding to the Requests,  
25 Individual Defendants will interpret “[REDACTED]” as referring to [REDACTED]  
26 [REDACTED]

27 36. Individual Defendants object to the definition of “[REDACTED]” as  
28 overly broad, unduly burdensome, vague, ambiguous and unintelligible to the extent

1 that it includes “any of the members, employees, representatives, officers, directors,  
2 managers, agents, attorneys, assigns, predecessors, affiliates, parents, subsidiaries,  
3 and any other entities or Persons acting or purporting to act on its behalf” and does  
4 not include the name of a legal entity. For purposes of responding to the Requests,  
5 Individual Defendants will interpret “[REDACTED]” as referring to [REDACTED]  
6 [REDACTED]

7 37. Individual Defendants object to the definition of “[REDACTED]r” as overly  
8 broad, unduly burdensome, vague, ambiguous and unintelligible to the extent that it  
9 includes “any of the members, employees, representatives, officers, directors,  
10 managers, agents, attorneys, assigns, predecessors, affiliates, parents, subsidiaries,  
11 and any other entities or Persons acting or purporting to act on its behalf” and does  
12 not include the name of a legal entity. For purposes of responding to the Requests,  
13 Individual Defendants will interpret “[REDACTED]” as referring to [REDACTED]

14 **SPECIFIC OBJECTIONS AND RESPONSES**

15 **REQUEST FOR PRODUCTION NO. 5:**

16 Documents concerning or reflecting Your and/or Your counsel’s  
17 Communications with any of the targets or recipients of a subpoena in this Action  
18 (including [REDACTED])  
19 related to such subpoena. For the avoidance of doubt, this request seeks the  
20 Communications themselves, as well as evidence of such Communications (such as  
21 calendar invites, or agreements regarding the subpoena responses).

22 **RESPONSE TO REQUEST NO. 5:**

23 In addition to the Preliminary Statement, General Objections, Objections to  
24 Instructions, and Objections to Definitions, which the Individual Defendants  
25 incorporate by reference herein, Individual Defendants object to this Request on the  
26 grounds that it is overly broad, unduly burdensome, and vague and ambiguous,  
27 including, but not limited to, the use of the undefined terms “any,” “including,”  
28 “agreements,” and “subpoena responses.”

1 Individual Defendants further object to this Request on the grounds that it  
2 seeks documents that are not relevant to the claims and defenses in the action, or are  
3 not proportional to the needs of the case.

4 Individual Defendants further object to this Request on the grounds that this  
5 Request bears no relation to temporary injunctive relief in aid of arbitration, the only  
6 potential form of discovery that may be allowed under the Consulting Agreements in  
7 this Court and pursuant to the Court's Order dated April 9, 2025, and that further no  
8 arbitration is pending as to them. This Request is accordingly overly broad, unduly  
9 burdensome, oppressive, and beyond the proper scope of discovery.

10 Individual Defendants object to this Request on the grounds that it is overbroad  
11 and unduly burdensome in that it asks Individual Defendants to attempt to locate  
12 documents and information for the time period from August 2, 2024 to the present.

13 Individual Defendants also object to the request to the extent that it seeks  
14 information protected from disclosure by the attorney-client privilege, the attorney  
15 work-product doctrine, the common interest privilege, or any other applicable  
16 privilege, doctrine or protection.

17 Based on the foregoing objections, Individual Defendants will not be  
18 producing any documents in response to this Request, to the extent any exist in their  
19 possession, custody, or control.

20 Respectfully submitted,

21 Dated: April 16, 2025

22 By: /s/ Grant P. Fondo  
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*Ilios Corp., Michael Alexander Holmes,  
Rafael Dias Monteleone, Santhiran  
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Vasconcelos*



**CERTIFICATE OF SERVICE**

I, Nirav Bhardwaj, declare:

I am employed in the County of San Mateo, California. I am over the age of eighteen and not a party to this action. My business address is Goodwin Procter LLP, 601 Marshall Street, Redwood City, California, 94063.

On April 16, 2025, I served true copies of the following document exactly entitled:

- **INDIVIDUAL DEFENDANTS THOMAS PATRICK FURLONG, ILIOS CORP., MICHAEL ALEXANDER HOLMES, RAFAEL DIAS MONTELEONE, SANTHIRAN NAIDOO, ENRIQUE ROMUALDEZ, AND LUCAS VASCONCELOS'S OBJECTIONS AND RESPONSES TO PLAINTIFF'S SECOND SET OF REQUESTS FOR PRODUCTION**

on the interested parties in this action, as follows:

**VIA EMAIL TRANSMISSION:**

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d/b/a SWAN BITCOIN

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28 I caused such document to be sent by email transmission to the parties indicated.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct, and that this declaration was executed on April 16, 2025, at Redwood City, California.

/s/ Nirav Bhardwaj  
Nirav Bhardwaj